

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NEW ENGLAND CARPENTERS HEALTH
BENEFITS FUND, PIRELLI ARMSTRONG
RETIREE MEDICAL BENEFITS TRUST;
TEAMSTERS HEALTH & WELFARE FUND
OF PHILADELPHIA AND VICINITY;
PHILADELPHIA FEDERATION OF
TEACHERS HEALTH AND WELFARE
FUND; DISTRICT COUNCIL 37, AFSCME -
HEALTH & SECURITY PLAN; JUNE
SWAN; MAUREEN COWIE and BERNARD
GORTER,

Plaintiffs,

v.

FIRST DATABANK, INC., a Missouri
corporation; and McKESSON
CORPORATION, a Delaware corporation,

Defendants.

C.A. No. 1:05-CV-11148-PBS

PLAINTIFFS' UNOPPOSED MOTION
FOR BRIEF EXTENSION OF
DEADLINE FOR PLAINTIFFS'
AMENDED CLASS CERTIFICATION
MOTION

Plaintiffs seek leave of Court for a brief, five-day extension of the deadline to file their Amended Class Certification Motion and a reciprocal five-day extension for McKesson to file its opposition. As this Court is well aware, Plaintiffs' counsel are currently engaged in a six-week trial in the related *AWP* case, which is scheduled to end on December 15, the deadline for Plaintiffs to file their amended certification motion in this case. Two of the lead counsel in this case are also lead in the *AWP* case. Given the scope of the *AWP* trial and the amount of time and resources Plaintiffs' counsel have had to devote to that case, it would be extremely difficult for lead counsel to have input into this filing prior to the December 15 deadline. Plaintiffs have conferred with opposing counsel, who do not object to reciprocal five-day extensions.

Plaintiffs therefore request that the Court's scheduling order of November 9 be amended as follows:

Plaintiff's Amended Class Certification Motion is due on December 20, 2006

Defendant's opposition is due January 24, 2007.

DATED: December 1, 2006

By /s/ Steve W. Berman

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CERTIFICATE OF SERVICE

I, Steve W. Berman, hereby certify that a true and correct copy of the above document was served on the attorney of record for each party via the Court's electronic filing system this 1st day of December, 2006.

/s/ Steve W. Berman

Steve W. Berman

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C.A. No. 1:05-CV-11148-PBS

[PROPOSED] ORDER GRANTING A
FIVE-DAY EXTENSION OF
DEADLINES FOR PLAINTIFFS'
AMENDED CLASS CERTIFICATION
MOTION

IT IS HEREBY ORDERED as follows:

1. The Court's November 9 scheduling order is amended.
2. Plaintiffs' Amended Class Certification Motion is due December 20, 2006.
3. Defendant's Opposition is due January 24, 2007.

DONE this _____ day of _____, 2006.

HONORABLE PATTI B. SARIS
United States District Court

CERTIFICATE OF SERVICE

I, Steve W. Berman, hereby certify that a true and correct copy of the above document was served on the attorney of record for each party via the Court's electronic filing system this 1st day of December, 2006.

/s/ Steve W. Berman

Steve W. Berman